

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth, ERS, and HTA.**

ORDER GRANTING THREE HUNDRED NINETEENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO DUPLICATE CLAIMS

Upon the Three Hundred Nineteenth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims [ECF No. 16645] (the “Three Hundred

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Nineteenth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), dated April 30, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth or ERS, as more fully set forth in the Three Hundred Nineteenth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Nineteenth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Nineteenth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims filed against the Commonwealth, HTA or ERS identified in the column titled “Claims to Be Disallowed” in Exhibit A to the Three Hundred Nineteenth Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of claims asserted against another of the Debtors, for which the asserted liability would lie, if at all, against another of the Debtors, not the Commonwealth, HTA or ERS; and the Court having determined that the relief sought in the Three Hundred Nineteenth Omnibus Objection is in the best interests of the Commonwealth, ERS, HTA, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Nineteenth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Nineteenth

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Nineteenth Omnibus Objection.

Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Nineteenth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims is reserved; and it is further

ORDERED that Prime Clerk is authorized and directed to delete the Claims to Be Disallowed from the official claims register in the Commonwealth Title III Case, the HTA Title III Case or the ERS Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 16645 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Nineteenth Omnibus Objection

Three Hundred and Nineteenth Omnibus Objection
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1 GARCIA, MARIA M. PO BOX 1584 ARECIBO, PR 00613	06/07/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	61381	\$ 98,673.90*	GARCIA, MARIA M. PO BOX 1584 ARECIBO, PR 00613	06/07/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	58950	\$ 98,673.90*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.									
2 NIEVES VAZQUEZ, ALMA E. H-33 CALLE CEREZA CAMPO ALEGRE BAYAMON, PR00956	08/03/20	Employees Retirement System of the Government of the Commonwealth of Puerto Rico 17 BK 03566-LTS	174729	\$ 80,000.00	NIEVES VAZQUEZ, ALMA E. H-33 CALLE CEREZA CAMPO ALEGRE BAYAMON, PR00956	08/03/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174730	\$ 80,000.00
Reason: Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.									
3 ORTIZ GUZMAN, NIRMA ENID A-11 CALLE 4 FOREST HILLS BAYAMON, PR00959	08/05/20	Employees Retirement System of the Government of the Commonwealth of Puerto Rico 17 BK 03566-LTS	174751	\$ 42,000.00	ORTIZ GUZMAN, NIRMA ENID A-11 CALLE 4 FOREST HILLS BAYAMON, PR00959	08/05/20	Commonwealth of Puerto Rico 17 BK 03283-LTS	174752	\$ 42,000.00
Reason: Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.									
4 P.D.C.M. ASSOCIATES, S.E. PO BOX 190858 SAN JUAN, PR 00919-0858	05/26/18	Puerto Rico Highways and Transportation Authority 17 BK 03567-LTS	27596	\$ 437,284.26	P.D.C.M. ASSOCIATES, S.E. PO BOX 190858 SAN JUAN, PR 00919-0858	05/26/18	Commonwealth of Puerto Rico 17 BK 03283-LTS	29504	\$ 437,284.26
Reason: Duplicate liability filed against Debtor Puerto Rico Highways and Transportation Authority. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.									